

EXHIBIT B

June 26, 2023

VIA EMAIL

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**Re: *In re The Roman Catholic Bishop of Oakland, Case No. 23-40523 (WJL)*
Employment of Priests Accused of Sexual Abuse**

Dear Ann Marie and Matt:

As you know, this firm represents the Official Committee of Unsecured Creditors (the “Committee”) of the Roman Catholic Bishop of Oakland (the “Bishop”) in the above-reference chapter 11 case. At the Rule 341(a) Meeting of Creditors held on June 21, 2023, it was disclosed that the Bishop employs two priests accused of having sexually abused children (the “Employed Accused Priests”). Under the “*Policy of the Diocese of Oakland Regarding Sexual Misconduct*” (the “Sexual Abuse Policy”) found on the diocese website, the Bishop committed to address “all reported allegations of sexual misconduct by clerics or diocesan employees in a prompt, comprehensive, and pastoral manner.” To that end, the diocese website, at <https://oakdiocese.org/victims-assistance>, sets forth 8 steps the diocese will take when it receives an allegation that a priest or deacon sexually abused a child.

In light of the foregoing, and the Committee’s authority to “investigate the acts [and] conduct ... of the debtor [and] the operation of the debtor’s business ... and any other matter relevant to the case or to the formulation of a plan,” the Committee requests that the Bishop immediately, and ***no later than Friday, June 30, 2023***, produce to the Committee all documents concerning the allegations made against the Employed Accused Priests and the Bishop’s response to same, including, but not limited to, the Employed Accused Priests’ priest or personnel file and all documents concerning:

1. the allegations made against the Employed Accused Priests;
2. the actions taken by the Bishop to comply with the Sexual Abuse Policy;

3. the actions taken by the Bishop to notify law enforcement and all communications with law enforcement with respect thereto;
4. the actions taken by the Bishop to place the Employed Accused Priests on a temporary suspension of all ministry and all communications with respect thereto;
5. the actions taken by the Bishop to communicate with a parish and others regarding the suspension of the Employed Accused Priests;
6. the actions taken by the Bishop to retain an independent private investigator to conduct an investigation and report findings to the Bishop and the Diocesan Review Board and all communications with the private investigator, including any reports issued by the private investigator;
7. The Diocesan Review Board's review of the independent private investigator's report and its recommendation to the Bishop;
8. the Bishop's determination if the allegations made against the Employed Accused Priests was substantiated or not; and
9. the Bishop's determination to continue the Employed Accused Priests' employment.

The Committee reserves all of its rights, none of which are waived.

Very truly yours,

/s/ Brent Weisenberg
Brent Weisenberg, Esq.

Enclosure

CC: Jeffrey R. Blease, Esq
Thomas F. Carlucci, Esq
Jeffrey Prol, Esq.
Michael Kaplan, Esq.
Colleen M. Restel, Esq.